



Reply To
Attn. Of: HW-106

NOV 15 1991

RCRA PERMIT
ADMINISTRATIVE RECORD
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11/15/1991

thanks Dave

FILE COPY

John Stiller
Chemical Processors, Inc.
2203 Airport Way South, Suite 400
Seattle, WA 98134

Re: Chemical Processors Pier 91 Facility
WAD 00081 2917

Dear Mr. Stiller:

Enclosed are comments on Chempro Pier 91's "Emission and Leak Monitoring Program." In general, the "program" as described is adequate. The comments in the enclosure are minor, particularly since the Pier 91 monitoring program is relatively small. According to your program, the Chempro Pier 91 facility does not have any process vents subject to 40 CFR 264 Subpart AA and only some equipment associated with two tanks subject to 40 CFR 264 Subpart BB.

If you have any questions or wish to verbally respond to any comment, you can reach me at 553-8582.

Sincerely,

David Croxton

David Croxton
Environmental Scientist

Enclosure

cc: ✓ C. Sikorski



COMMENTS ON CHEMPRO PIER 91
"EMISSION AND LEAK MONITORING PROGRAM"

1) Page 9, 1st sentence. In accordance with 40 CFR 264.1058(c)(1), insert the following boldface: "Repairs to equipment must be completed **as soon as practicable, but not later than 15 days** after the detection of the leak."

2) Page 11, Calibration Precision Test, 1st sentence. Insert the following boldface: "Calibration precision testing will be performed before each **day** the analyzer is ..."

3) Inspection Forms. Are there only two monitoring diagrams as included with the program inspection forms? Sheet 1 Of 2 of the Leak Monitoring Form does not have adequate space to place monitoring results for pumps P1, P2 and valves V1, V2, V4, V19 and V20. Sheet 2 Of 2 of the Leak Monitoring Form does not indicate what the diagram is of, what its location is, or any equipment on it to be monitored. Please provide this information.

4) In accordance with 40 CFR 264.1064, the monitoring plan should include a list of equipment points (e.g., valve, pump, etc.), their identification number, what type of service they are in (e.g., heavy liquid service, light liquid service, valves in gas/vapor service, etc.), what unit the equipment is associated with (e.g., tank #105), method of compliance with the standard (e.g., cap, closed-purge system, etc.), percent-by-weight total organics in the hazardous waste stream, and the hazardous waste's physical state at the equipment point (gas, vapor, or liquid).